# CIVIL RIGHTS COMPLIANCE REVIEW REPORT FOR

# Sacramento Department of Human Assistance Conducted August 25-29, 2008

California Department of Social Services

Human Rights and Community Services Division

Civil Rights Bureau

744 P Street, M.S. 6-70

Sacramento, CA 95814

<u>Reviewer</u>

(916) 654-2107

Jaime Urquizo

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Civil Rights Compliance Review Sacramento County August 25-29, 2008

#### **CIVIL RIGHTS COMPLIANCE REVIEW REPORT**

# I. <u>INTRODUCTION</u>

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Sacramento Department of Social Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on August 25 thru August 28, 2008 with an introductory meeting held with Harm Wilkinson, Civil Rights Coordinator. An exit interview was held with Harm Wilkinson on August 29, 2008 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
County of Sacramento Dept of Human Assistance	3960 Research Drive, Sacramento, CA	FNS Followup	English, Spanish
County of Sacramento Dept of Human Assistance	2700 Fulton Ave, Sacramento, CA	CalWorks	English, Spanish, Russian
County of Sacramento Dept of Human Assistance	257 Lincoln Way, Galt, CA	CalWorks, Food Stamps	English, Spanish
County of Sacramento Dept of Human Assistance	5747 Watt Ave, Sacramento, CA	CalWorks	English, Spanish, Russian
County of Sacramento Dept of Human Assistance	9136 Elk Grove, Elk Grove, CA	CalWorks, Food Stamps	English, Spanish, Vietnamese

# II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

#### Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	3	English, Spanish, Russian, Vietnamese
Children Social Workers	17	English, Spanish, Russian, Vietnamese
Receptionist/Screeners	4	English, Spanish, Russian, Vietnamese
Total		

An additional xxx interviews were scheduled but were not conducted due to staff unavailability.

# **Program Manager Surveys**

Number of surveys distributed	4
Number of surveys received	3

# **Reviewed Case Files**

English speakers' case files reviewed	29
Non-English or limited-English speakers'	41
case files reviewed	
Languages of clients' cases	Spanish, Russian, Tagalog, Armenian, Hmong,
	Arabic, Laotician, Vietnamese, Cambodian

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

# III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

## A. Findings

Access to Services, Information and Outreach	Yes	No	Some- times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	Х			
Does the county have extended hours to accommodate clients?	Х			
Can applicants access services when they cannot go to the office?	Х			
Does the county ensure the awareness of available services for individuals in remote areas?	Х			

Signage, posters, pamphlets	Yes	No	Some- times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X			

Signage, posters, pamphlets	Yes	No	Some- times	Comments
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	Х			
Was the Pub 13 available in large print, audiocassette and Braille?		X		GALT: Spanish and English available, receptionist did not know where other languages were being kept.
		Х		WATT: when asked the receptionist did not know where the Braille, large print, and audio was being kept.
		X		ELK GROVE: Braille, large print Available – NO CD/Audio tape available
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	Х			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		Х		Numerous of instructional – directional signs were not available, in threshold languages, in each of the following building locations checked:  3940 RESEARCH:
				-"No Smoking" (entry way)
				-"No Guns Knives Allowed on Premises" (2 signs at entry way)
				-"Emergency Exit" (lobby)
				-"Caution keep Area Clear" (3 signs) (lobby)

Signage, posters, pamphlets	Yes	No	Some- times	Comments
				-"FISCAL" (lobby)
				-"FISCAL hours" (lobby)
				-"To Apply for Aid Obtain Blank forms" (lobby)
				-"Please wait in Line" (lobby)
				-"RECEPTION WINDOW" (lobby)
				-"Line Starts Here – 2,3,4,5,6,&7" (lobby)
				2700 FULTON:
				ENTRY WAY
				"Dangerous weapons or Articles are prohibited in or upon any Sacramento County Building or Grounds"
				"No Food or Drink Allowed in Building"
				"PROHIBITION: The carrying, transportation, use or possession of dangerous articles is prohibited in or upon any County Building or grounds"
				"NO weapons of any Kind allowed in this building"
				LOBBY
				"Fiscal Hours or Operation" (hours)
				"Child Waiting Room Hours of Operation" (hours)
				"Child Waiting"

Signage, posters, pamphlets	Yes	No	Some- times	Comments
				"Fiscal Services Windows 6 & 7"
				"Please turn off your Cell Phone while at the window Thank You"
				Electronic Sign - threshold language translation needed
				"Emergency Exit – No Re-Entry Without Authorization"
				Form on Wall – Threshold Language translation needed
				"Career Center"
				"Job Center"
				"Oak Room"
				"Interview Rooms"
				"SFIS/EBT"
				"Open – Come in"
				257 S. LINCOLN (GALT):
				Two signs at entry and lobby were not in threshold languages
				ENTRY "No Smoking"
				LOBBY: "Training Room"
				5747 WATT:
				ENTRY:
				"Hours"
				"Stand Clear – Automatic Sliding Door"

Signage, posters, pamphlets	Yes	No	Some- times	Comments
				"Automatic Door Keep Moving (2)"
				"No Guns or Knives allowed on Premises"
				"NO Weapons of any kind allowed in this building"
				"Mail Box sign – ( MAL)"
				"Exit Sign"
				LOBBY:
				"09 Betty Warren Community Room"
				"Job Club Workshop sign"
				"Do not Push any other button except start"
				"Emergency Exit Only"
				"Push sign"
				"Child Waiting Area"
				"Window A"
				"This Window Closed"
				"Window B"
				"Please push to open"
				"Interview Rooms"
				"Please Keep this walkway clear"
				"Station 2"
				"38 SFIS"

Signage, posters, pamphlets	Yes	No	Some- times	Comments
				9136 ELK GROVE:
				ENTRY:
				"Monday – Friday" (hours)
				"No Smoking within 20 feet of main entrance, exits and operable windows"
				RECEPTION:
				"Reception sign"
				"In order to serve you better please do the following" – sign
				"NO Weapons of any kind allowed in this building"
				"No cell phones at the Window Please"
				"Do Not exit out of this door after 5 p.m"sign

# B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	Sacramento County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language.  Div. 21-115.2
Auxiliary aids	Sacramento County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4

Informational Element	Corrective Action Required
Directional signage	Sacramento County shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages.  Div. 21-107.212 and .24

#### C. Recommendation

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights\_498.htm.

### IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

# A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

# A1. Facility Location: 3940 RESEARCH, SACRAMENTO

# A2. Facility Location: 2700 FULTON, SACRAMENTO

Facility Element	Findings	Corrective Action
Parking	One freestanding sign was 78'.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133
	Eight access aisles on passenger side of van space had ramps extending into parking space by 8'.	Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p 135
Directional and Informational Signage	Numerous signs at entry and throughout lobby not in threshold languages.  ENTRY WAY  "Dangerous weapons or Articles are prohibited in or upon any Sacramento County Building or Grounds"  "No Food or Drink Allowed in Building"  "PROHIBITION: The carrying, transportation, use or possession of dangerous articles is prohibited in or upon any County Building or grounds"  "NO weapons of any Kind allowed in this building"  LOBBY  "Fiscal Hours or Operation" (hours)	Directional and Informational Signage should be available in threshold languages. Div 21.107-212

"Child Waiting Room Hours of Operation" (hours) "Child Waiting"

"Fiscal Services Windows 6 & 7"

"Please turn off your Cell Phone while at the window Thank You"

Electronic Sign threshold language translation needed

"Emergency Exit – No Re-Entry Without Authorization"

Form on Wall – Threshold Language translation needed

"Career Center"

"Job Center"

"Oak Room"

"Interview Rooms"

"SFIS/EBT"

"Open - Come in"

# A3. Facility Location: 257 S LINCOLN WAY, GALT

Facility Element	Findings	Corrective Action
Parking	There is no "unauthorized parking" signage at entrance to off-street.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating:  "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at or by telephoning" (CA T24 1129B.5) p. 133
	Persons with disabilities are forced to go behind cars. With Disabled Parking in rear – clients have to walk behind cars, towards the street side of a building and around to the front.	Persons with disabilities shall not be forced to go behind parked cars except their own. (CA T24 1129B.4.3) (hardship exception, p. 136)
	Path of travel is not within an access aisle to get to entrance of building.	Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p 136 Walkways minimum 48" (CA T24 1133B.7.1) p. 160
	Parking is NOT located as close as possible to entrance. The Van Accessible Parking spot is to the rear of the building.	Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p. 131
Route To Main Door	A sidewalk crossing has a 1" deep crevice preventing smooth passage near the front entry way.	Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1) p. 160

Main or Alternate Entrance	Directional signage is not available and accessible to the main entrance.	Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1) p. 160
	Force to open Lobby door excessive at 10lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
	Lobby is very crowded, with chairs and people sitting in accessible routes. Interior accessible routes must be 36" in length.	Wheelchair passage width: minimum clear width required for a single wheelchair is 32" at a point (e.g., at a door); and continuous length is 36" (at a corridor). (CA T24 1118B.1, ADA 4.2.1) p. 217
	Wheelchair turning space does not have a 5-foot circle or 5-foot T-shaped space for person to turn around.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217
Lobby	Receptionist did not know where other language Pub13's were being kept.	Current: 05/01 or 01/04 (Div 21-107.221)
Directional and Informational Signage	Two signs at entry and lobby were not in threshold languages.  ENTRY "No Smoking" LOBBY: "Training Room"	Directional and Informational Signage should be available in threshold languages. Div 21.107-212
Client Interview Rooms & Booths	Turnaround in Interview cubicle did not have a 5' turnaround, 36" wide pathway. Interview cubicle in front lobby did not have 5 ft turnaround. Pathway was 34".	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217

		10
	Offices in the back, of the building, did not have a clear 36" accessible pathway. The offices had boxes and chairs in the path of travel, difficult for a wheelchair to be maneuvered. Accessible pathways were 32"- 34" in width.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217
Emergency Alarms	There is no visible Audible Fire alarm.	If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2.4, ADA 4.28.1) p. 221
Men's Restroom	Men's Restroom Door - Force to open door excessive at 15 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom	Women's Restroom Door - Force to open door excessive at 10 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

# A4. Facility Location: 5747 WATT, SACRAMENTO

Facility Element	Findings	Corrective Action
Main or Alternate Entrance	There was no International Symbol of Accessibility (ISA) sign on the entry door.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
	There was no ISA sign – with non-glare finish.	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355
	Force to open Entrance doors excessive at 12 lbs (left door) and 7 lbs (right door).	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Lobby	When requested, receptionist did not know where the Braille, large print, and audio tapes were kept.	(Div 21-107.221)
Client Interview Rooms & Booths	There were a total of eighteen interview rooms. Two rooms did not have ample 5' turnaround and 36" pathway into the room.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217
Directional and Informational Signage	Numerous signs at entry and throughout lobby were not in threshold languages.	Directional and Informational Signage should be available in threshold languages. Div 21.107-212
	ENTRY: "Hours"	
	"Stand Clear – Automatic Sliding Door"	

		18
	"Automatic Door Keep Moving (2)"	
	"No Guns or Knives allowed on Premises"	
	"NO Weapons of any kind allowed in this building"	
	"Mail Box sign – ( MAL)"	
	"Exit Sign"	
	LOBBY: "09 Betty Warren Community Room"	
	"Job Club Workshop sign"	
	"Do not Push any other button except start"	
	"Emergency Exit Only"	
	"Push sign"	
	"Child Waiting Area"	
	"Window A"	
	"This Window Closed"	
	"Window B"	
	"Please push to open"	
	"Interview Rooms"	
	"Please Keep this walkway clear"	
	"Station 2"	
	"38 SFIS"	
Men's Restroom	Men's Restroom Door -	Interior Door will have 5 pounds maximum

	Force to open door excessive at 8 lbs.	pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom	Women's Restroom Door - Force to open door excessive at 8 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

A5. Facility Location: 9136 ELK GROVE, ELK GROVE

Facility Element	Findings	Corrective Action
Parking	Freestanding sign, closest to the entry driveway, is too short measuring 75" in length.	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133 Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p.133
	Both Regular and Van parking spots are too short at 17'2" in length.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p.135
	Both Regular and Van parking spots are too short at 8'9" width.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p.135
Main or Alternate Entrance	There is no sign with the international symbol of accessibility.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
	There are no ISA signs – non-glare finish, color contrast.	Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355
	Force to open Entrance door excessive at 12 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Lobby	The only counter in Lobby was at 41" (too high).	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 349
	Braille and Large Print were available. There was no CD/Tape audio available.	(Div 21-107.221)
Client Interview Rooms	Six (6) Interview rooms	Wheelchair Turning Space is a minimum

& Booths	had no 5' turnaround.	space for a wheelchair to turn 180 degrees in
& Bootis	nad no 3 tumaround.	a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217
Directional and Informational Signage	Numerous signs at entry and throughout lobby not in threshold languages.	Directional and Informational Signage should be available in threshold languages. Div 21.107-212
	ENTRY:	
	"Monday – Friday" (hours)	
	"No Smoking within 20 feet of main entrance, exits and operable windows"	
	RECEPTION:	
	"Reception sign"	
	"In order to serve you better please do the following" – sign	
	"NO Weapons of any kind allowed in this building"	
	"No cell phones at the Window Please"	
	"Do Not exit out of this door after 5 p.m" sign	
Men's Restroom	Accessible sign on wall missing. There must be	Door sign and wall sign shall be 60" above the floor.
	signage on the door, and on the wall, adjacent to the latch side of the door.	For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263
		Raised characters shall be raised 1/32"

	Men's Restroom Door - Force to open door excessive at 13 lbs.  The Toilet paper Dispenser was 16" from front edge of toilet.	minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263  Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195  Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269  Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269
Women's Restroom	Accessible sign on wall missing. There must be signage on the door, and on the wall, adjacent to the latch side of the door.	Door sign and wall sign shall be 60" above the floor.  For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263
	Women's Restroom Door - Force to open door excessive at 13 lbs.	Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263
	The Toilet paper Dispenser was 18" from front edge of toilet.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
	Pipes under the sink were not insulated. They must be securely insulated.	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp 275, 269 Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269
		Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267

# V. <u>FACILITY PHOTOGRAPHS</u>



**2700 FULTON** 

August 25, 2008



# Freestanding sign height should be at 80". Was at 78"



Clearance access aisle on passenger side of van space Ramp encroaches into access aisle. (8 ramps)



Clearance access aisle on passenger side of van space Ramp encroaches into access aisle. (8 ramps)

3 Ramps on opposite side of building.



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages

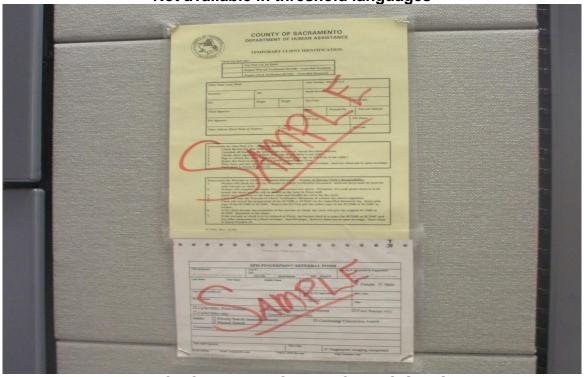


DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages

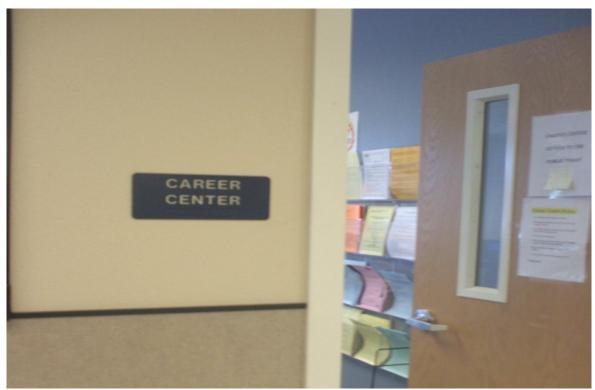


DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages

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DIRECTIONAL & INFORMATIONAL SIGNAGE
Not available in threshold languages



**257 S LINCOLN WAY, GALT** 

August 26, 2008



Persons with Disabilities forced to go behind cars?

- Disabled parking is in the rear clients have to walk behind cars, if they park in the rear of the building
  - Parking is NOT close to the front entrance



MAIN ENTRANCE: Directional Signage to accessible entrance.

Sign not posted



Safe Route of travel (to front entrance)

The sidewalk crossing has a deep 1" indentation preventing smooth sidewalk travel.



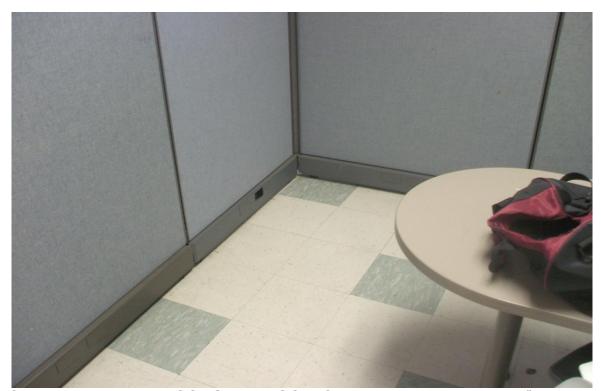
The sidewalk crossing has a deep 1" indentation preventing smooth sidewalk travel.



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not available in threshold languages

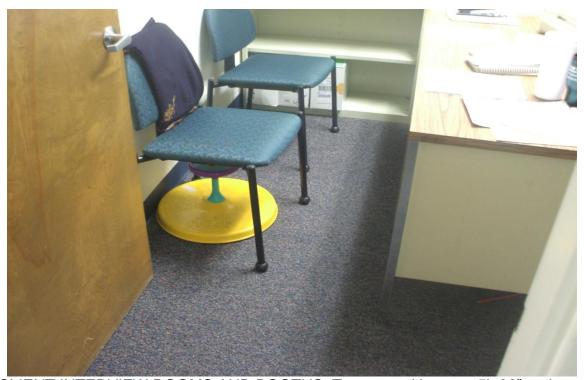


DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



CLIENT INTERVIEW ROOMS AND BOOTHS: Turnaround in room 5', 36" pathway

Cubicle DID NOT have 5' turnaround



CLIENT INTERVIEW ROOMS AND BOOTHS: Turnaround in room 5', 36" pathway

Office DID NOT have 5' turnaround and 36" pathway to move



CLIENT INTERVIEW ROOMS AND BOOTHS: Turnaround in room 5', 36" pathway
Office DID NOT have 5' turnaround and 36" pathway to move



5747 WATT, SACRAMENTO August 27, 2008



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not available in threshold languages
ACCESSIBLE SIGNAGE
No ISA signs posted



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



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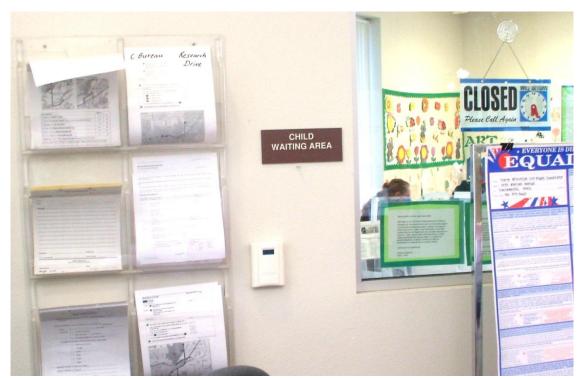
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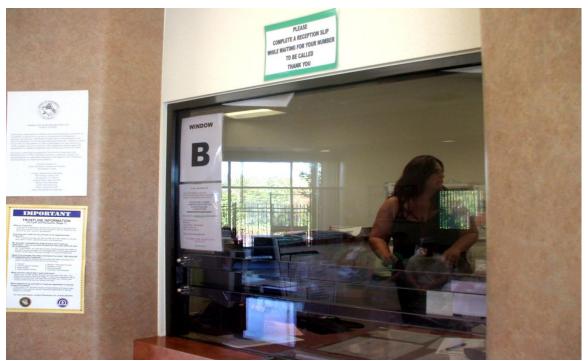
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CLIENT INTERVIEW ROOMS AND BOOTHS: Turnaround in room 5', 36" pathway

Office DID NOT have 5' turnaround and 36" pathway to move

Seating at table or desk (min. 27" high knee clearance, min. 30" wide, 19" depth underneath)?

Knee Space unavailable



9136 ELK GROVE, ELK GROVE August 28, 2008



Unauthorized parking signage at entrance to off-street accessible parking Sign is low in display and not clearly readable



Freestanding sign height should be at 80".

Was at 75" in height



PARKING: Accessible space minimum 9' wide, 18' long, 5' access All Regular and Van parking spots are short 8'9" wide and 17'2" long



**DIRECTIONAL & INFORMATIONAL SIGNAGE** 

Not available in threshold language (hours)

#### ACCESSIBLE SIGNAGE

No ISA signs posted



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE
Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



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Not available in threshold languages



DIRECTIONAL & INFORMATIONAL SIGNAGE Not available in threshold languages



CLIENT INTERVIEW ROOMS AND BOOTHS: Turnaround in room 5', 36" pathway

Office DID NOT have 5' turnaround and 36" pathway to move



CLIENT INTERVIEW ROOMS AND BOOTHS: Turnaround in room 5', 36" pathway

Office DID NOT have 5' turnaround and 36" pathway to move

### VI. <u>PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-</u> ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

#### A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some- times	Comments
Does the county identify a client's language need upon first contact? How?	Х			
Does the county use a primary language form?	Х			
Does the client self- declare on this form?	Х			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			

Question	Yes	No	Some-	Comments
A.C. 10.1	.,		times	
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			
Is there a delay in providing services?	Х			
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?	Х			
Does the county allow the client to provide his or her own interpreter?	Х			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	Х			
Does the county use the CDSS-translated forms in the clients' primary languages?		Х		257 S Lincoln, Galt: 7 cases did not use the QR 377.4 and 9 cases did not use the QR 377.1 and mailed to client.

Question	Yes	No	Some- times	Comments
		Х		5747 Watt, Sacto: 7 cases did not use the QR 377.4 and 3 cases did not use the QR 377.1 and mailed to client.
		X		9136 Elk Grove, Elk Grove: 30 cases did not use the QR 377.4 and 3 cases did not use the QR 377.1 and mailed to client.
Is the information that is to be inserted into NOA translated into the client's primary language?	Х			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing,		Х		5747 WATT, SACRAMENTO: When requested, receptionist did not know where the Braille, large print, and audio was being kept.
speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?		X		9136 ELK GROVE, ELK GROVE: There was no CD/Tape audio available.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	Х			
Does the county offer screening for learning disabilities?	Х			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	Х			

#### **B.** Corrective Actions

Area of Findings	Corrective Actions
Effective Services	Sacramento County must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities.  Div. 21-115
Written Materials	Sacramento County must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS.  Div. 21-115.2
Auxiliary Aids	Sacramento County shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services.  Div 21-115.41

## VI. <u>DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS</u>

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

# A. Findings from Case File Reviews and Staff Interviews

Documented Item	CalWORKs	Non-Assisted Food Stamps
Ethnic origin	An SC 106 Language Preference	An SC 106 Language Preference
documentation	form is being used by each office	form is being used by each office
	to document cultural preference.	to document cultural preference.
Primary language	An SC 106 Language Preference	An SC 106 Language Preference
documentation	form is being used by each office	form is being used by each office
	to document language	to document language preference.
	preference.	
Marth a Later and Pro-	TI - 00 100 I	TI 00 400 I
Method of providing	The SC 106 Language	The SC 106 Language Preference
bilingual services and	Preference form is being used by	form is being used by to document
documentation	to document the offer of bilingual services.	the offer of bilingual services.
	Services.	
Client provided own	The SC 106 Language	The SC 106 Language Preference
interpreter	Preference form is also being	form is also being used by to
	used by to document reference to	document reference to usage of
	usage of own interpreter.	own interpreter.

Documented Item	CalWORKs	Non-Assisted Food Stamps
Method to inform	The SC 106 Language	The SC 106 Language Preference
client of potential	Preference form is also being	form is also being used by to
problem using own	used by to document reference to	document reference to usage of
interpreter	usage of own interpreter and	own interpreter and potential
	potential problems.	problems.
Release of	The SC 106 Language	The SC 106 Language Preference
information to	Preference form is being used to	form is being used to document
Interpreter	document release of information.	release of information.
Individual's	The SC 106 Language	The SC 106 Language Preference
acceptance or refusal	Preference form is being used to	form is being used to document
of written material	document acceptance or refusal	acceptance or refusal of written
offered in primary	of written material in primary	material in primary language.
language	language.	
Documentation of	Some Documentation is found in	Some Documentation is found in
minor used as	client files. Not always complete.	client files. Not always complete.
interpreter		
Documentation of	Some Documentation is found in	Some Documentation is found in
circumstances for	client files. Not always complete.	client files. Not always complete.
using minor		
interpreter temporarily		
Translated nation of	NOAs did show translated incorts	NOAs did show translated income
Translated notice of	NOAs did show translated inserts	NOAs did show translated inserts
actions (NOA) contain translated inserts		
translated inserts		
Method of identifying	The SC 106 Language	The SC 106 Language Preference
client's disability	Preference form asked for	form asked for hearing, visual
	hearing, visual impairment	impairment services need.
	services need.	
Method of	The SC 106 Language	The SC 106 Language Preference
documenting a client's	Preference form asked for	form asked for hearing, visual
request for auxiliary	hearing, visual impairment	impairment services need.
aids and services	services need.	

# B. Corrective Actions

Areas of Action	Corrective Action
Temporary use of a minor (under 18 years of age) as an interpreter	When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring temporary use of minors in the case record. Div. 21-116.22

Areas of Action	Corrective Action				
	Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.				
General	Sacramento County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance.  Div. 21-116				

#### C. Recommendation

## VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

## A. Findings

Interview questions	Yes	No	Some- times	Comments
Do employees receive continued Division 21 Training?	Х			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	Х			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			

## VIII. <u>DISCRIMINATION COMPLAINT PROCEDURES</u>

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

### A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some- times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Х			
Did the employees know who the Civil Rights Coordinator is?	Х			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Х			

#### IX. CONCLUSION

The CDSS found the County of Sacramento Department of Human Assistance (DHA) in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. The civil rights program was visible in the main reception areas with translated signage and an overall "climate" of participant service. Staff reflected a commitment similar to that expressed by management with respect to ensuring access and assistance. Although the DHA offices visited are providing appropriate client support, there remain issues with documentation of translation services when accomplished by a child under 18, the availability to provide Braille, Audio and Large print to clients when needed in some offices, and regular usage of translated forms provided by CDSS to clients.

It should be noted that there was, once again, exceptional cooperation and coordination provided by the Civil Rights Coordinator and the district staff throughout the review. The reviewer was able to discuss the findings with district supervisory staff and found them to be both receptive and informative.

The County of Sacramento Department of Human Assistance must remedy the deficiencies that were identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the deficiencies.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.